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HITACHI DISPLAYS, LTD. (n/k/a JAPAN
DISPLAY INC.), HITACHI AMERICA, LTD.,
AND HITACHI ELECTRONIC DEVICES
(USA), INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. Master File No. 3:07-cv-05944-SC

MDL NO. 1917

This Document Relates to:

All Indirect Purchaser Actions

*Electrograph Systems, Inc., et al. v. Hitachi,
Ltd., et al., No. 3:11-cv-01656-SC;*

*Alfred H. Siegel as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd., et
al., No. 3:11-cv-05502-SC;*

**REPLY DECLARATION OF ELIOT A.
ADELSON IN SUPPORT OF HITACHI
PARTIES' MOTION FOR SUMMARY
JUDGMENT BASED UPON THE LACK
OF EVIDENCE OF PARTICIPATION IN
THE ALLEGED CONSPIRACY**

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

1 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.*,
2 No. 3:11-cv-05513-SC;

3 *Target Corp, et al. v. Chunghwa Picture Tubes,*
4 *Ltd., et al.*, No. 3:11-cv-05514-SC;

5 *Sears, Roebuck and Co. and Kmart Corp. v.*
6 *Chunghwa Picture Tubes, Ltd.*, No. 3:11-cv-
05514-SC

7 *Interbond Corporation of America, d/b/a*
8 *BrandsMart USA v. Hitachi, et al.*,
No. 3:11-cv-06275-SC;

9 *Office Depot, Inc. v. Hitachi, Ltd., et al.*,
10 No. 3:11-cv-06276-SC;

11 *CompuCom Systems, Inc. v. Hitachi, Ltd.,*
12 *et al.*, No. 3:11-cv-06396-SC;

13 *Costco Wholesale Corporation v. Hitachi,*
14 *Ltd., et al.*, No. 3:11-cv-06397-SC;

15 *P.C. Richard & Son Long Island Corporation, et*
16 *al. v. Hitachi, Ltd., et al.*, No. 3:12-cv-02648-SC;

17 *Schultze Agency Services, LLC on behalf of*
18 *Tweeter OPCO, LLC and Tweeter Newco, LLC v.*
19 *Hitachi, Ltd., et al.*, No. 3:12-cv-02649-SC;

20 *Tech Data Corporation, et al. v. Hitachi,*
21 *Ltd., et al.*, No. 3:13-cv-00157-SC

1 I, Eliot A. Adelson, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and the Northern
3 District of California. I am a partner with the firm of Kirkland & Ellis LLP, and counsel for Hitachi
4 America, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display Inc.), and Hitachi Electronic Devices
5 (USA), Inc. (collectively, the "Hitachi Parties"). I submit this Reply Declaration in Support of
6 Hitachi Parties' Reply to Motion for Summary Judgment Based Upon the Lack of Evidence of
7 Participation in the Alleged Conspiracy. Except for those matters stated on information and belief,
8 about which I am informed and which I believe to be true, I have personal knowledge of the matters
9 set forth herein, and could and would testify competently to each of them.

10 2. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 3. [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 4. [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 5. [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 6. [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 7.

3 8.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 DATED: January 23, 2015

By: /s/ Eliot A. Adelson

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